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Mr. Jose P. Albuquerque
Chief, Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex parte* response to SpaceX
IB Docket No. 16-408

Dear Mr. Albuquerque:

Telesat hereby responds to a recent presentation by SpaceX to use the $\Delta T/T$ standard proposed in the draft Report and Order for downlink transmissions and a different $\Delta T/T$ standard, coupled with angular separation for uplink transmissions, to resolve the in-line event band sharing issue.¹

Changing the $\Delta T/T$ threshold does nothing to resolve the inherent problem that the information needed to determine $\Delta T/T$ cannot be exchanged by operators in real time. Adding back an angular separation component to the standard only compounds that problem, which is not addressed in SpaceX's proposal. SpaceX asserts that using a $\Delta T/T$ standard as a trigger for defining in-line events "could be workable,"² but does not explain how that standard could be implemented on a real-time basis.

¹ See Letter from William M. Wiltshire, Counsel to SpaceX, to Marlene H. Dortch, Secretary, FCC, re *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, IB Docket No. 16-408, Sept. 15, 2017 (*ex parte* presentation to International Bureau regarding the draft order) ("Space X *ex parte* Letter").


² *Id.* at 2.

With regard to SpaceX's repeated argument in favor of uplink power limits, Telesat has previously demonstrated that such limits are not only unnecessary, but they could "easily impair growth and innovation"³ and thereby reduce broadband capacity for certain designs and adversely affect the availability of services to the consumer.⁴ SpaceX's new proposal of a 25% $\Delta T/T$ standard, coupled with angular separation limitation, is simply a "backdoor" attempt to introduce uplink power limitations.

While SpaceX couches its proposal as one designed to encourage "spectral efficiency,"⁵ all SpaceX actually presents is a proposal designed to reflect its own choices of system design. SpaceX states it supports the "flexibility gained in the new rules for emerging NGSO architectures,"⁶ but when it comes to crucial matters of system design, it espouses a rule that would deny such flexibility in favor of one that works only to advantage its own system architecture. Telesat urges the Commission to reject SpaceX's proposal out of hand.

Please direct any questions regarding this matter to the undersigned.⁷

Respectfully submitted,


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cc: Rachael Bender
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³ See Reply Comments of Telesat Canada, *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, IB Docket No. 16-408, at 16 (Apr. 10, 2017) ("*Telesat Reply Comments*").

⁴ *Telesat Reply Comments* at 15-17.

⁵ *Space X ex parte Letter* at 3.

⁶ *Id.* at 1.

⁷ This letter is being filed electronically through the Electronic Comment Filing System for inclusion in the public record in IB Docket No. 16-408 pursuant to the Commission's *ex parte* rules.